

MEMO ENDORSED

April 29, 2020

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC #:
DATE FILED: 4/29/2020

VIA ECF

The Honorable Valerie E. Caproni
United States District Judge
United States District Court for the
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square
New York, New York 10007

Re: Rusis et al v. International Business Machines Corp., Civil Action No. 1:18-cv-08434

Dear Judge Caproni:

The parties jointly submit this letter to request a sixty-day adjournment of the Initial Pretrial Conference scheduled for 10 a.m. on Friday, May 1, 2020, to allow the parties to explore a possible resolution of this matter. The parties are in the process of scheduling a mediation to take place within the next 60 days and thus would like to postpone the imposition of deadlines during this time. If during this period, the parties conclude that a resolution is not achievable, the parties will promptly notify the Court. This is the second request to adjourn the Initial Pretrial Conference. The first request was necessitated by the unavailability of Defendant's counsel on the original date of the Conference.

Thank you in advance for your consideration.

Respectfully submitted,

/s/ Shannon Liss-Riordan
Shannon Liss-Riordan
LICHTEN & LISS-RIORDAN, P.C.
Attorneys for Plaintiffs

/s/ Matthew W. Lampe
Matthew W. Lampe
JONES DAY
Attorneys for Defendant

Application GRANTED. The IPTC is adjourned to **July 10, 2020, at 10:00 a.m.** The parties must submit a status letter and revised proposed CMP no later than **July 2, 2020**.

SO ORDERED.


4/29/2020

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE